

42-003-00032



January 16, 2008

USEPA Region III
Director: Air and Radiation Division
1650 Arch Street
Philadelphia, Pennsylvania 19103

Subject: United States Steel Corporation – Mon Valley Works
40 CFR 63.1164(c)(2) Semi-Annual Report
40 CFR 63 Subpart CCC Notification of Compliance Status

Dear Sir or Madam:

40 CFR 63.1164(c)(2), National Emission Standards for Hazardous Air Pollutants for Steel Pickling-HCl Process Facilities and Hydrochloric Acid Regeneration Plants requires that an affected source provide a semiannual report on the status of pickling operations as they pertain to the source's start-up, shutdown and malfunction plan. In addition, 40 CFR 63.9(h)(2)(i) and 40 CFR 63.1163(e), require that a notification of compliance status be sent to the Administrator, including applicable performance tests. This letter satisfies all of these requirements.

At its Mon Valley Works, United States Steel Corporation owns and operates two continuous pickle lines (CPL) that are subject to 40 CFR 63, Subpart CCC. These lines, each of which utilizes a wet scrubber air pollution control device, are designated:

1. 64-Inch Continuous Pickle Line
2. 84-Inch Continuous Pickle Line

40 CFR 63.1164(c)(2) states the following: "...if actions taken by an owner or operator during a start-up, shut down or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the start-up, shut down and malfunction plan, the owner or operator shall state such information in a semiannual report." During the July through December 2007 timeframe, all actions taken by United States Steel during start-ups and shut downs were consistent with the respective start-up, shutdown and malfunction plans.

In accordance with 40 CFR 63.9(h)(2)(i) and 40 CFR 63.1163(e), this letter along with its attachments serves as the notification of compliance status for the hydrochloric acid pickling lines at this facility.



As required by 40 CFR 63 (9)(h), the following information is provided:

- A. Maintenance requirements at 40 CFR 63.1160 and monitoring requirements at 40 CFR 63.1162 will be used to determine continuing compliance.
- B. The hazardous air pollutant regulated by 40 CFR 63 Subpart CCC is hydrogen chloride.
- C. Mon Valley Works is a major source for HAP emissions.
- D. A wet scrubber air pollution control device controls the HCl emissions from each of the affected sources. Compliance demonstration results for the 84-inch and 64-inch Pickle Line wet scrubbers are not enclosed in this submission, because the Irvin Plant has received written permission from the Allegheny County Health Department to conduct a compliance demonstration on the 64-inch and 84-inch Pickle Lines twice per Title V operating permit. For the time period covered by this notification, Mon Valley Works has complied with the requirements of 40 CFR 63 Subpart CCC.

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate and complete. If you have any questions regarding this submission, please contact the Irvin Plant's Environmental Engineer, Mike Dzurinko, at (412) 675-7381. We believe that this correspondence fully satisfies the compliance status notification requirements of 40 CFR 63 Subpart CCC.

Sincerely,


Anton Lukac
General Manager, Mon Valley Works

cc: M. Dzurinko
M. Hohman *MH*
M. Jeffrey

40 CFR 63, Subpart CCC

National Emission Standards for Hazardous Air Pollutants for Steel Pickling-HCl Process Facilities and Hydrochloric Acid Regeneration Plants

Periodic Startup, Shutdown, and Malfunction Report
§63.10(d)(5)(i) of subpart A

Affected Facility	Date	Type of Event	Duration	Startup, Shutdown, Malfunction Plan Followed (§63.6(e)(3) of subpart A)
64" Continuous Pickle	8-22-07	Shutdown	23 Minutes – Line was down during shutdown	Yes
	8-22-07	Startup		Yes
	9-19-2007	Shutdown	30 Minutes – Line was down during shutdown	Yes
	9-19-2007	Startup		Yes
	10-24-2007	Shutdown	14.25 Turns – 64°CPL	Yes
	10-29-2007	Startup	Annual Outage	Yes
84" Continuous Pickle	10-24-2007	Shutdown	33.75 Turns – 84°CPL	Yes
	11-1-2007	Startup	Annual Outage	Yes